

RECEIVED

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

OCT 10 2017 *EW*

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

Brandon Johnson Brown

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

vs.

Thomas J. Dart

1:17-cv-07288

Judge Robert M. Dow, Jr  
Magistrate Judge Young B. Kim  
PC2

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

CHECK ONE ONLY:

☒

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)

☐

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)

☐

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

**I. Plaintiff(s):**

- A. Name: Brandon Johnson-Brown
- B. List all aliases: \_\_\_\_\_
- C. Prisoner identification number: 205-0922172
- D. Place of present confinement: Cook County Correctional Center
- E. Address: P.O. Box 089002 Chicago IL 60608

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: Thomas J. Dart  
Title: County Sheriff  
Place of Employment: Cook County Dept of Corrections
- B. Defendant: \_\_\_\_\_  
Title: \_\_\_\_\_  
Place of Employment: \_\_\_\_\_
- C. Defendant: \_\_\_\_\_  
Title: \_\_\_\_\_  
Place of Employment: \_\_\_\_\_

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)



III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: Commissary  
1:17-CV-D5658
- B. Approximate date of filing lawsuit: August 03, 2017
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: Brandon L. Johnson-Brown
- D. List all defendants: Thomas J. Dart
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Northern District of Illinois Cook County
- F. Name of judge to whom case was assigned: Judge Robert M. Dear  
Magistrate Judge Young B. Kim PCZ
- G. Basic claim made: Cook County Jail are forcing  
USAs detainees to purchase these high priced  
items that supposedly accomodates the employers  
of commissary
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): IS IS STILL pending
- I. Approximate date of disposition: IT IS UNKNOWN AT THIS POINT

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: 1:17-cv-05633 (Bond)
- B. Approximate date of filing lawsuit: Aug 02, 2017
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: Brandon Johnson-Brown
- D. List all defendants: Thomas J. Dart
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Cook County, Northern District
- F. Name of judge to whom case was assigned: Judge Virginia M. Kendall  
Magistrate Judge Jeffrey T. Gilbert PCT
- G. Basic claim made: Being unlawful held against my  
will by violating my constitutional rights  
As an American citizen
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): IT IS STILL pending
- I. Approximate date of disposition: That is unknown at this point

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.



## IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

I am currently detained at Cook County Department of Corrections for an alleged crime. From the beginning of my stay up until now I have consistently grieved /<sup>or</sup> filed grievances for being forced to live in these filthy living conditions. It started out with them housing me in Division 1 Cell. My living quarters, sleeping quarters, and where we are to shower we are surrounded by mold, humongous roaches and rats. When asked the staff <sup>they</sup> blatantly disregarded anything we requested. Finally I was moved to Division 2 Dorm 4. Everything was moldy. The entire drop ceiling was infested with mold as well as the bathroom area. The mold was so strong you can smell its stench waiking from the walls and drop ceiling. The County staff paints over the infested areas when someone important is doing a walk through. That's when they also



power wash with a water pressure with no solution. The pipes are so rusted and old you could smell its stench as it comes out the faucet. That's why every staff member and OFC brings in their own water. The living conditions are practically the same everywhere around the compound. That's how I had a break out from taking shower in Division 11. Showers walls covered in black mold. When you write a grievance their respond orders on your desk are supposed to clean the mold up. They want us to use the water-down chemicals whenever they decided to have it available. Without no proper protection Equipment nor OSHA training. Risking harming ourselves by accidentally mixing chemicals. This is a problem because mold already enhances your respiratory problems. On top of everything we have to bath with flying biting bugs. And the County refuses to have an exterminator come by. Cook County Jail is the biggest jail in the nation but for some reason the living conditions are close to the jail in a third world country. It has been two months and we are still wearing the same uniform. → TEN OVER

which is horrible because we are given these designated days to change our clothes and bed sheets. But for approximately two months we haven't been given the opportunity to change clothes. Knowing when we sweat we should be able to exchange clothes. But the jail could care less, they showing how they truly feel about us while violating our rights.



which is horrible because we are given two designated days to change our clothing and bed sheets. But for approximately two months we haven't been given the opportunity to change clothes. Knowingly when we sweat we should be able to exchange clothes. But the jail could care less, they showing how they truly feel about us while violating rights.



V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I would like to be compensated for physical, mental  
and emotional distress.

VI. The plaintiff demands that the case be tried by a jury. ☐ YES ☒ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 22 day of AUGUST, 2017

Brandon Johnson Brown  
(Signature of plaintiff or plaintiffs)

Brandon Johnson Brown  
(Print name)

2015-0922172  
(I.D. Number)

P.O. Box 089002

Chicago, IL 60608  
(Address)